

CORRESPONDENCE/MEMORANDUM

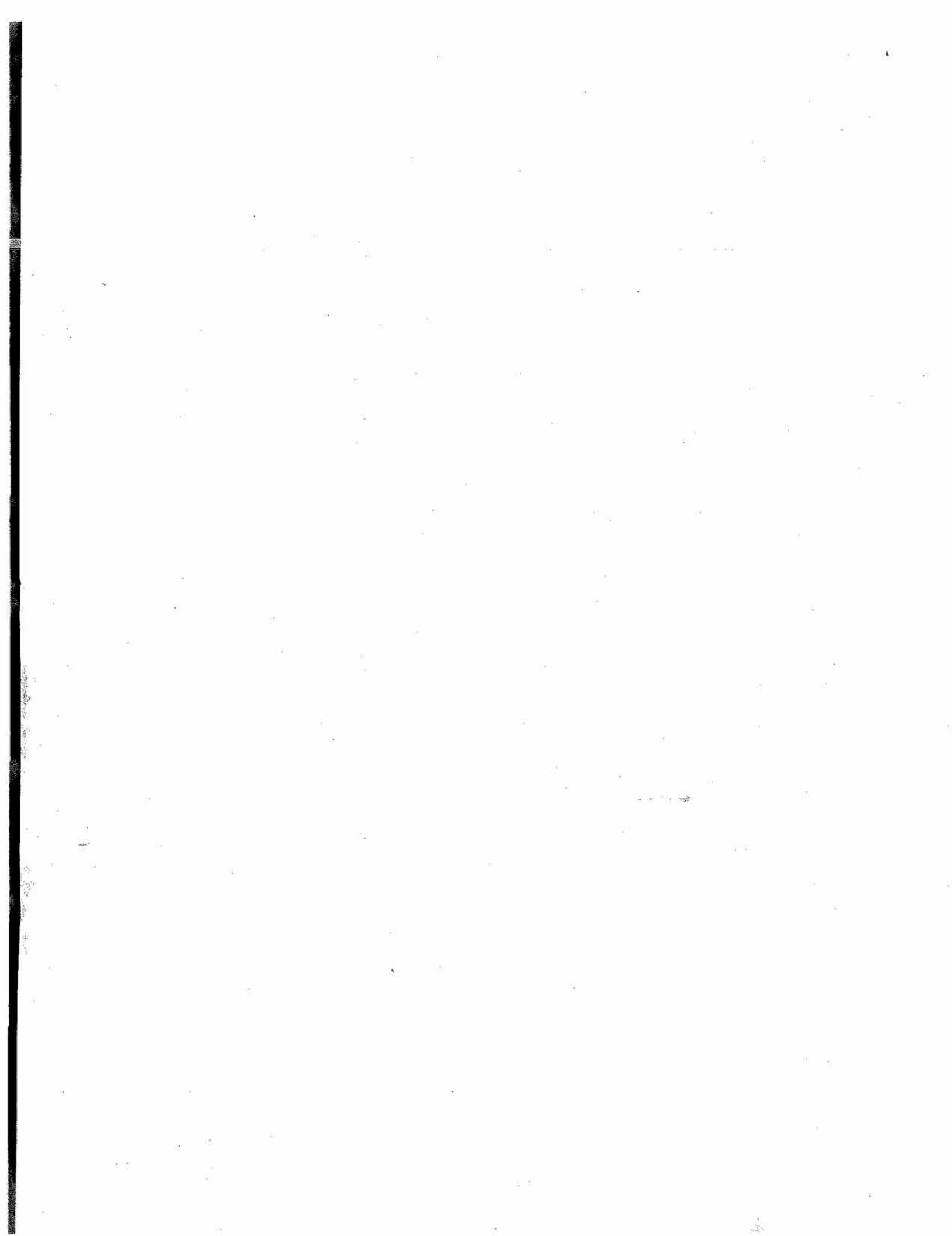
DATE: February 19, 1999

File Code: 4530

PRELIMINARY STACK TEST REVIEW55 071 00025
KEY 051By: Jeannine Campion Test Date: Nov 24, 1998Name of Source: Rockwell Lime, FID #: 4310-034-390Address: 4110 Rockwood Rd Stack #: SIICity: Manitowoc, WI Process #: P36Permit #: 93-RV-108 Date Issued: Feb 7, 1995Description of Source Tested: Lime KilnDescription of Control Equipment: BaghouseTest Firm: Environmental Monitoring + Technologies
Crew Chief & Phone#: _____Pollutant Tested: Particulates Test Method: 5/202Pollutant Tested: SO₂ Test Method: 19Pollutant Tested: Opacity Test Method: CEMTest Production Level: 24.5 tons/m³ stone feedRated Production Level: 25 tons/m³ stone feedDiscussion of Results:Poll. Test Ave. = 0.41 lb/ton stone Limit = 0.30 lb/ton stone file
In Compliance? Y N JCPoll. Test Ave. = 1.92 lb/MMBTU Limit = 5.5 lbs/MMBTU file
In Compliance? Y N 2/26/99Poll. Test Ave. = 1.99% Limit = 2.1% SUPER file
In Compliance? Y NPoll. Test Ave. = 0 % Limit = 10 % file
In Compliance? Y NIs This a Valid Test? Y N If answer is no, please indicate the reason.

* Test may be reviewed in depth later, if necessary.

CC Joe Perez - AM/7
US EPA Region V



GASEOUS TEST CHECKLISTName of Source: Rockwell Lime Gas Tested: SO₂ Test Date: Nov 24, 1998

1. A stack test shall consist of three valid runs or, at a minimum, two valid runs if one run is voided. Is this a valid test? YES NO
- If no, inform the District or the source that the test is unacceptable and should be redone. Your review is over.

Eq. 1 PPM_{DRY} = PPM_{WET}/(1-% Moisture as Decimal)

Eq. 2 PPM_{DRY@ 7% O₂} = PPM_{DRY}*(20.9-7)/(20.9-Stack O₂)

Eq. 3 PPM_{DRY@ 12% CO₂} = PPM_{DRY}*12/Stack CO₂

2. If the limit is in PPM_{DRY} or in PPM_{DRY} corrected to a certain O₂ or CO₂ value, solve Eq. 1-3. Do your results match the consultant's? YES NO N/A
If no, fix the problem or call the consultant for a correction.

Eq. 4 mg/DSCM = PPM_{DRY}*Molecular Weight of Gas/24.06

Eq. 5 Lb/DSCF = 2.595*10⁻⁹*PPM_{DRY}*Molecular Weight of Gas

Eq. 6 Lb/DSCF = 6.243*10⁻⁸*(mg/DSCM)

Eq. 7 Lb/Hr = 60*DSCFM*(Lb/DSCF) Eq. 8 Lb/10⁶ BTU = (Lb/Hr)/(10⁶ BTU/Hr)

Eq. 9 Lb/10⁶ BTU = (Lb/DSCF)*F Factor*20.9/(20.9-Stack O₂)

3. If the limit is in mg/DSCM, Lb/DSCF, Lb/Hr, or Lb/10⁶ BTU, solve the needed Eq. Eq. 1-3 may also be needed. Do your results match the consultant's?
If no, fix the problem or call the consultant for a correction.

YES NO

fixed

Eq. 10 % Capture Eff. = (Lb VOC/Hr to Control Equiv.)*100
(Lb VOC/Hr Input to Process)

Eq. 11 % Destruction Eff. = (Inlet Lb VOC/Hr - Outlet Lb VOC/Hr)*100
(Inlet Lb VOC/Hr)

Eq. 12 % Overall Eff. = (% Cap. Eff./100)*(% Dest. Eff./100)*100

4. If the limit is in terms of % Capture Eff., % Dest. Eff., or % Overall Eff., solve the needed Eq. Eq. 1-9 may also be needed.
Do your results match the consultant's?
If no, fix the problem or call the consultant for a correction.

YES NO N/A

5. Is the three run(or two run) average correct?
If no, write in the correct average.

YES NO

6. Is the average result in compliance?
If no, the District should issue an NOV.

YES NO

7. Was the source operating at a level representative of full capacity?

YES NO

If no, the permit release may need to provide conditions to cap the source at the test level until a stack test at a higher production level(showing compliance) is performed. If the test was not for permit release, other actions may be warranted.

98%

PARTICULATE CHECKLIST

Name of Source: Rockwell Line Test Date: Nov 24, 1998

1. Are the isokinetics per run between 90 and 110%? YES NO
If the %I for a run is outside the range, void the run. See 5.
2. Is the sample volume per run \geq 30 DSCF? YES NO
If the sample volume for a run is $<$ 30 DSCF, void the run. See 5.
3. Is the sample time per run \geq 60 min.? YES NO
If the sample time for a run is $<$ 60 min., void the run. See 5.
4. Is the sample time per sample point \geq two min.? YES NO
If the sample time per point for a run is $<$ two min., void the run. See 5.
5. A stack test shall consist of three valid runs or, at a minimum, two valid runs if one run is voided. Is this a valid test? YES NO
If no, inform the District or the source that the test is unacceptable and should be redone. Your review is over.
6. Is the total particulate per run added correctly? YES NO
If an incorrect total is found, correct the total and the results or call the consultant and ask for a correction.
7. Was the backhalf included in the total particulate? YES NO
NSPS sources are exempt from including the backhalf. All other sources must include the backhalf. If they don't, the test is invalid. See 5.

Eq. 1 $Gr/DSCF = 15.43 * g \text{ of part.} / \text{sample volume of run in DSCF}$

Eq. 2 $Gr/DSCF @ 12\% CO_2 = (Gr/DSCF) * 12 / \text{Stack CO}_2$

Eq. 3 $Gr/DSCF @ 7\% O_2 = (Gr/DSCF) * (20.9 - 7) / (20.9 - \text{Stack O}_2)$

Eq. 4 $Lb/DSCF = (Gr/DSCF) / 7000$ Eq. 5 $Lb/MLb_{DRY} = 385.6 * 10^3 * (Lb/DSCF) / MW_{DRY}$

Eq. 6 $Lb/MLb_{WET} = 385.6 * 10^3 * (Lb/DSCF) * (1 - (\% \text{ Moisture} / 100)) / MW_{WET}$

Eq. 7 $Lb/Hr = 60 * DSCFM * (Lb/DSCF)$ Eq. 8 $Lb/10^6 \text{ BTU} = (Lb/Hr) / (10^6 \text{ BTU/Hr})$

Eq. 9 $Lb/10^6 \text{ BTU} = (Lb/DSCF) * F \text{ Factor} * 20.9 / (20.9 - \text{Stack O}_2)$

8. If the emission limit is in Gr/DSCF, Lb/DSCF, Lb/MLb, Lb/Hr or Lb/ 10^6 BTU, solve the needed Eq. Do your results match the consultant's? YES NO
If no, fix the problem or call the consultant for a correction.

9. Is the three run(or two run) average correct?
If no, write in the correct average.

10. Is the average result in compliance?
If no, the District should issue an NOV.

11. Was the source operating at a level representative of full capacity?
If no, the permit release may need to provide conditions to cap the source at the test level until a stack test at a higher production level(showing compliance). is performed. If the test was not for permit release, other actions may be warranted.

N/A
YES NO

YES NO

YES NO

YES NO

98%

ROCKWELL LIME COMPANY

4110 Rockwood Rd., Manitowoc, WI 54220-9619

920-682-7771 • 1-800-558-7711 • Fax: 920-682-7972

January 18, 1999

Mr. James Crawford, P.E.
State of Wisconsin \ Department of Natural Resources
Lake Michigan District Headquarters
P.O. Box 10448
1125 North Military Ave.
Green Bay, WI 54307-0448

Dear Mr. Crawford:

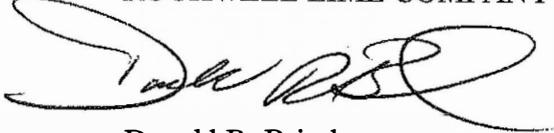
Enclosed are two (2) copies of Environmental Monitoring & Technologies (EMT) Report No. 98-530, detailing the procedures followed, and results obtained, from the emissions compliance test program performed on #2 kiln at Rockwell Lime Company on November 24, 1998. Attached to the back of each report is a copy of the opacity strip chart for the period during the test and a copy of the proximate and ultimate analysis report on the coal/petroleum coke blend that was used during the test.

I would like to suggest that the first particulate sample test be thrown out due to the fact that it is 208% higher than the average of the other two (2) tests and is 860% higher than the average of our last two (2) stack tests. I have contacted EMT and the only explanation that they could give me was that the sample volume for test #1 was very close to the minimum required. I have also checked our records and found that all of the filter bags for the baghouse on #2 kiln were replaced in July of 1998 which represents only four (4) months of operating time. During the previous two (2) stack tests, we had an average of 11 months operating time. Since filter bag efficiency is directly related to the amount of dust cake built up on the bags, this could explain why the 1998 stack test results were dramatically higher than the previous two (2) stack tests.

If you have any questions or require additional information regarding this report, feel free to call me at (414) 682-7771.

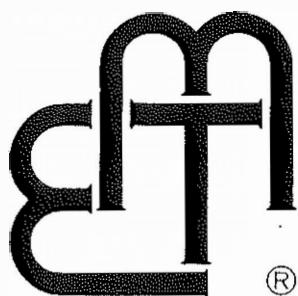
Sincerely,

ROCKWELL LIME COMPANY



Donald R. Brisch
V. P. of Operations

Rev. 1/20/99



Not In compliance

JMC

EMT Report Number 98-530
Compliance Lime Kiln Test Program for
ROCKWELL LIME COMPANY
Manitowoc, Wisconsin
Test Date: November 24, 1998
Report Date: December 31, 1998

**ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.**

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847/967-6666
FAX: 847/967-6735

Analytical Testing
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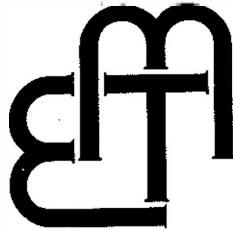
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*Groundwater Monitoring
Laboratory Services
Mobile Laboratory Services
Source Emissions*

*Waste Characterization (RCRA)
Wastewater Compliance Monitoring
• Pretreatment
• User Charge*

December 31, 1998



Mr. Don Brisch
Rockwell Lime Company
4110 Rockwood Road
Manitowoc, WI 54220

Re: EMT Report Number 98-530
Compliance Emissions Test Program
Lime Kiln Exhaust

Dear Mr. Brisch:

Enclosed please find three copies of Environmental Monitoring and Technologies' Report No. 98-530, detailing the procedures followed and results obtained, from the emissions compliance test program performed at the Rockwell Lime facility in Manitowoc, Wisconsin.

All procedures followed, data obtained, and resulting calculations from the study are contained herein. The accuracy of this data has been verified and is complete, to the best of my knowledge.

If you have questions, or require additional information regarding this report, feel free to call me at 847/967-6666.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Whitaker".

Jay Whitaker
Director, Source Emissions Department

JW/tms

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OBJECTIVE

Rockwell Lime Company, of Manitowoc, Wisconsin, retained Environmental Monitoring and Technologies, Inc., to conduct a compliance test program upon one Lime Kiln Exhaust, at the Rockwell facility in Manitowoc, Wisconsin.

The intent of this test program was to demonstrate compliance with Wisconsin DNR Permit No. 93-RV-108, dated February 7, 1995.

Testing was performed as per the guidelines of the Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (USEPA).

Parameters determined were:

- * Stack gas velocity - ft. Per second
- * Volumetric flow rate - acfm, scfh, dscfh
- * Oxygen and carbon dioxide content of stack gas - %
- * Gas moisture content - % by volume
- * Gas temperature - °F
- * Particulate matter - gr/dscf, lb/hr
- * Condensable particulate (back-half) - gr/dscf, lb/hr
- * Opacity - by CEM

Coordinating the sampling program were:

Don Brisch.....Rockwell Lime Company
Jay Whitaker.....EMT Source Emissions Director
Mike Betka.....EMT Project Manager

Mr. James Crawford, and Ms. Jeannine Campion of the Wisconsin Department of Natural Resources, Green Bay Area Office, were also present to observe the testing.

INTRODUCTION

Overview of Project

Rockwell Lime Company is located at 4110 Rockwood Road, in Manitowoc, Wisconsin.

Three (3) one-hour runs were performed on November 24, 1998, at the Lime Kiln Baghouse Exhaust, for particulate emissions, condensable particulate, and sulfur dioxide.

Sampling Location

The sampling location complied with the requirements in 40 CFR, Part 60, Appendix A, Method 1, with the following exception:

"B" dimension of approximately 6.5 ft. = approx. 1.08 dia.

This deviation was previously deemed acceptable by Mr. Jim Crawford, of the Wisconsin DNR for the 1996 compliance test program, and was addressed in EMT Protocol 98-530.

The test ports were located beyond all existing pollution control devices.

The sampling location at the Lime Kiln Exhaust has a stack area of 27.494 ft.

SUMMARY OF SAMPLING

EMT performed the following USEPA procedures to meet the requirements of their specified work. These methods may be referenced in Title 40, Code of Federal Regulations, Part 60, Appendix A, Part 51, Appendix M, and the applicable ASTM documents.

The methods are titled as follows:

- | | |
|----------------|---|
| EPA Method 1 | Sample and Velocity Traverses for Stationary Sources |
| EPA Method 2 | Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube) |
| EPA Method 3 | Gas Analysis for the Determination of Dry Molecular Weight |
| EPA Method 4 | Determination of Moisture Content in Stack Gas |
| EPA Method 5 | Determination of Particulate Emissions from Stationary Sources (WI modified method) |
| EPA Method 6C | Determination of Sulfur Dioxide Emissions from Stationary Sources (Instrument Analyzer Procedure) |
| EPA Method 19 | Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates |
| EPA Method 202 | Determination of Condensible Particulate Emissions |

EMT also adhered to the following EPA and ASTM procedures:

- | | |
|-------------------|--|
| EPA 600/9-76-005 | Quality Assurance Handbook for Air Pollution Measurement Systems, Vol. 1, Principles, 1976 |
| EPA 600/4-77-027b | Quality Assurance Handbook for Air Pollution Measurement Systems, Vol. III, 1979 |
| ASTM E 300-92 | Standard Practice for Sampling Industrial Chemicals, 1992 |

Determination of Volumetric Flow Rate

At the Lime Kiln Baghouse Exhaust, EMT sampled in accordance with EPA Methods 1-4

1. Teflon Tape was used on all joints to seal sample train.
As part of each test run, the following was acquired:
 - a. a multi-point integrated gas sample was collected in order to determine the carbon dioxide content using Orsat gas analysis.
 - b. the gas flow was determined.
 - c. a point-by-point temperature grid was established.
 - d. the stack gas moisture was determined.
 - e. the static pressure was determined.

Determination of Particulate Matter (including Condensable Particulate Matter)

Each test run for Particulate Matter was performed in accordance with EPA Method 5, as well as adhering to WDNR requirements:

1. Teflon Tape was used on all joints to seal the sampling train.
2. Sampling was performed isokinetically.
3. Glass microfibre filters were used to collect particulate matter.
4. Particulate grain loading was determined.
5. "Back-half" condensable particulate matter was determined in accordance with EPA Method 202.
6. Each test run was a minimum of 60 minutes in duration, with a minimum sample volume of 31.8 dscf. Three test runs were performed.
7. Results are reported in gr/dscf, lb/hr and lb/ton stone feed.

Determination of Sulfur Dioxide

Each test run for Sulfur Dioxide was performed in accordance with EPA Method 6C, as well as adhering to WDNR requirements:

1. An integrated gas sample was extracted and drawn through a Bovair/Western Research 721 SO₂ monitor.
2. The sample gas was drawn through a heated sample line to prevent condensation prior to the gas conditioner.
3. Protocol calibration gases were used to calibrate this instrument Before and after every run.
4. A datalogger was used to collect data.
5. Results are expressed as ppmv db, and lb/hr.
6. Heat input is determined from the hourly average recorded during testing. Natural gas consumption and coal consumption was continuously monitored during testing.
7. F-factor for the above fuels is determined from Title 40, Code of Federal Regulations, Appendix A. Park 60, Method 19, Table 19-1.

Visual Determination of the Opacity of Emissions from Stationary Sources

As per conversations with Mr. James Crawford, of the Wisconsin Department of Natural Resources, Green Bay Office, and as addressed in EMT Protocol 98-530, Opacity CEM data will be acceptable for the determination of visible emissions.

Strip chart to be submitted directly to the Wisconsin DNR, by Rockwell Lime Company, along with this report.

QUALITY ASSURANCE AND QUALITY CONTROL PROCEDURES

Quality Control Procedures

Quality Control Procedures for all aspects of field sampling; sample preservation, holding time, reagent quality, analytical method, analyst training and safety, instrument cleaning, calibration and safety are followed. These procedures are consistent with EPA Guidelines documented in "Quality Assurance Handbook for Air Pollution Measurement Systems;" Volume III, "Stationary Source Specific Methods;" (EPA-600/4-77-027b).

All appropriate equipment is calibrated at EMT's laboratory prior to delivery to the job site.

Chain of Custody

Documentation of the chain of custody of samples and data obtained during the test program is essential for insuring the validity of the test program results. These procedures are followed during sampling, sample and data transport, sample preparation and analysis, storage of data, as well as archived samples and reported results.

EMT follows the protocol listed in SW 846, Section 1.3 during field sampling and in-house laboratory analysis.

EMT Calibration Procedures and Frequency Chart

Dry gas meter:	Acceptable if $Y_i = Y \pm 2\%$ Calibrated vs. Standard meter.
Thermometers:	Impinger thermometer accurate within $\pm 1^\circ\text{C}$, dry gas meter thermometer within $\pm 3^\circ\text{C}$ over range, stack temperature sensor $\pm 1.5\%$ of absolute temperature.
Probe Heating System:	Capable of maintaining $248^\circ\text{F} \pm 25^\circ$ at a flow of 0.71 ft./min.
Barometer:	Accurate within $\pm 2.5 \text{ mm}(0.1\text{in}) \text{ Hg}$ of Hg in glass barometer. Calibrated vs. Hg in glass barometer.
Type S Pitot tube:	Calibrated initially in the lab. Before and after each test run visual inspection.
Stack gas temperature measurement system:	Acceptable if capable of measuring within $\pm 1.5\%$ of minimum stack temperature. Calibrated initially and after each field testing program.

SUMMARY OF RESULTS

Summaries of test results from the emissions compliance test program conducted at Rockwell Lime Company, on November 24, 1998, as well as process data furnished by Rockwell Lime Company, is presented in the tables on the following pages.

Appendix A contains all Calculations Summary Pages, Field Data Sheets, and Monitor Data.

Appendix B contains Laboratory Results and Chain of Custody Forms.

Appendix C contains Calibration Data and Cylinder Gas Certification Sheets.

**ENVIRONMENTAL
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8100 North Austin Avenue
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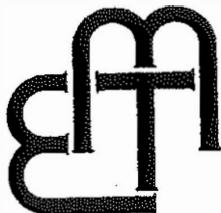
Groundwater Monitoring
Laboratory Services
Mobile Laboratory Services
Source Emissions

Waste Characterization (RCRA)
Wastewater Compliance Monitoring
• Pretreatment
• User Charge

FAX TRANSMISSION NOTICE

Date: 2-19-99

Time: 4:30 p.m.



To: Jim CRAWFORD
Company: WDNR/ GREEN Bay
Fax Number: 920-492-5913
Sender: TEDDIE SCHMIDT

You should receive 5 pages, including this notice. If you do not receive all pages, please call the sender immediately. This transmission includes:

Comments: REVISED PAGES 8 + 9 (ALSO AFFECTED)
+ CALC. Summary Pages

Our FAX Number is: (847) 967-6735

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY, BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

EMT Report 98-530

SUMMARY TABLE #1 - LIME KILN EXHAUST RESULTS - REVISED

COMPANY: Rockwell Lime Company
 LOCATION: Manitowoc, WI (Rockwood)
 SOURCE: Lime Kiln Exhaust
 TEST DATE: 11-24-98

TEST RUN	1	2	3	AVERAGE
GAS PARAMETERS				
Velocity (ft/sec)	37.2	38.5	39.5	38.4
Volume flow (acfmin)	61286.4	63570.6	65084.7	63313.9
Volume flow (scfh, wb)	2469353.3	2402567.1	2468783.9	2446901.4
Volume flow (dscfh)	2331469.4	2278168.0	2332093.0	2313910.1
Temperature (deg. F)	322.7	374.4	371.4	356.2
Oxygen (%)	15.0	13.8	14.0	14.3
Carbon Dioxide (%)	13.5	13.0	13.0	13.2
Moisture (% by volume)	5.6	5.2	5.5	5.4
PARTICULATE SAMPLE				
Sample Volume (dscf)	32.647	47.430	48.203	
Isokinetic	90.1	99.4	98.7	
Mass Collected (mg)	113.3	58.5	52.0	
Concentration (gr/dscf)	0.05355	0.01903	0.01665	0.02974
Emission rate (lb/hr)	17.84	6.20	5.55	9.86
Emission Rate, lb/Ton Stone Feed	0.75	0.25	0.23	0.41
SO2 RESULTS				
SO2 conc (ppm)	379.7	369.7	394.5	381.3
Emission rate (lb/hr)	145.06	140.04	152.98	146.03
Emission rate (lb/MMBTU)	1.779	1.660	1.875	1.77
PROCESS DATA				
Heat Input (MMBtu/hr)	81.53	84.36	81.60	82.50
Stone Feed (Tons/hr)	23.73	24.6	24.47	24.27

OPACITY RESULTS

The Opacity CEM read "0" throughout the entire test period.

Strip chart attached to this report by Rockwell Lime Company, prior to submittal to WDNR.

EMT Report 98-530

Environmental Monitoring & Technologies, Inc.

SUMMARY TABLE #2 - PROCESS DATA / SUPPLEMENTARY RESULTS - REVISED

Company: Rockwell Lime Company
 Location: Manitowoc, WI
 Source: Lime Kiln Exhaust
 Run #: 1-3
 Date: 11-24-98

Manufacturing Data Compiled During EMT's Stack Test on #2 Kiln

Test Run	Time	Natural Gas (CF)	Coal/Coke Blend (Lbs)	Stone Feed (Tons)	Baghouse Pressure Differential Readings Across Each Compartment							
					#1	#2	#3	#4	#5	#6	#7	#8
#1	1009 - 1109	19,900	4,949	23.73	2.6	2.4	2.4	2.4	2.5	2.3	2.5	2.5
#2	1203 - 1303	20,400	5,137	24.60	2.7	2.5	2.4	2.4	2.1	2.1	2.2	2.6
#3	1344 - 1444	20,400	4,914	24.47	2.1	2.2	2.2	2.2	2.0	2.1	2.2	2.2
Fuel Data		Natural Gas	Coal/Coke Blend									
Btu Value / CF or Lb		1,012	12,404									
% Sulfur / CF or LB		2.90E-05	1.99									

Total Heat Input MMBTU/hr = ((Nat. Gas CF x BTU Value) + (Coal/Coke Blend Lbs x BTU Value)) ÷ 1e06

SO2 lb/MMBTU = SO2 lb/hr ÷ MMBTU/hr

Particulate lb/Ton Stone Feed = Particulate lb/hr ÷ Ton Stone Feed/hr

Test Run	Heat Input (MMBTU/hr)	SO2 (lb/hr)	SO2 (lb/MMBTU)	Stone Feed (Tons/hr)	Particulates (lb/hr)	Particulates (lb/Ton Stone Feed)
#1	81.53	145.06	1.779	23.73	17.84	0.75
#2	84.36	140.04	1.660	24.60	6.20	0.25
#3	81.60	152.98	1.875	24.47	5.55	0.23

RECEIVED

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
 Location Manitowoc, WI
 Source Lime Kiln Baghouse Outlet
 Run # 1
 Date 11-24-98

<u>GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)</u>	=	32.647 dscf
<u>PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)</u>	=	0.056
<u>GAS VOLUME FLOW RATE, (dscfh)</u>	=	2331469.4 dscfh
<u>FRONT 1/2 PARTICULATE MASS, FILTER AND PROBE WASH (Mf)</u>	=	49.6 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), INORGANIC MASS (Mi)</u>	=	52.7 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), ORGANIC MASS (Mo)</u>	=	11.0 mg
<u>FRONT 1/2 PARTICULATE CONCENTRATION, (gr/dscf)</u> Mf x 0.001g/mg x 1/Vmstd x 15.43 gr/g	=	0.0234 gr/dscf
<u>INORGANIC CPM CONCENTRATION, (gr/dscf)</u> Mi x 0.001g/mg x 1/Vmstd x 15.43 gr/g	=	0.0249 gr/dscf
<u>ORGANIC CPM CONCENTRATION, (gr/dscf)</u> Mo x 0.001g/mg x 1/Vmstd x 15.43 gr/g	=	0.0052 gr/dscf
<u>TOTAL MEASURED PARTICULATE MATTER CONCENTRATION, (gr/dscf)</u>	=	0.0535 gr/dscf
<u>FRONT 1/2 PARTICULATE EMISSION RATE, (lb/hr)</u> 2.205E-06 lb/mg x Mf x dscfh x 1/Vmstd	=	7.8105 lb/hr
<u>INORGANIC CPM EMISSION RATE, (lb/hr)</u> .205E-06 lb/mg x Mi x dscfh x 1/Vmstd	=	8.2986 lb/hr
<u>ORGANIC CPM EMISSION RATE, (lb/hr)</u> 2.205E-06 lb/mg x Mo x dscfh x 1/Vmstd	=	1.7322 lb/hr
<u>TOTAL MEASURED PARTICULATE EMISSION RATE, (lb/hr)</u>	=	17.8413 lb/hr
<u>CALCULATION OF PERCENT ISOKINETIC VARIATION</u> 100 % x (0.09450 x Ts°R x Vmstd) / (Ps x Vs x An x minutes x (1-Bws))	=	90.1 %
Gas Temperature, Ts°R = 782.7	Gas Velocity, Vs = 37.2	
Absolute Gas Pressure, Ps = 29.78	1 - Bws = 0.944	
Area of Nozzle (sq.ft.), An = 0.0004276	minutes = 60	

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
 Location Manitowoc, WI
 Source Lime Kiln Baghouse Outlet
 Run # 1
 Date 11-24-98

Barometric (Pbar)	29.80	in.Hg	Static Pressure (Pg)	-0.21	in.H2O
Meter Y Factor (Y)	0.9969		Volume Measured (Vm)	33.750	cubic ft.
Stack Area (As)	27.494	sq. ft.	Square Root delta P	0.5532	in.H2O
Oxygen	15.0	%	Δ H	1.28	in.H2O
Carbon Dioxide	13.5	%	Gas Temperature (Ts)	322.7	°F
Impinger Condensate (Wi)	30	mL	Meter Temp. (Tm)	83.5	°F
Silica Gel Gain (Ws)	11	g	CPM Inorganic Mass (Mi)	52.7	mg
Front ½ Particulate (Mf)	49.6	mg	CPM Organic Mass (Mo)	11.0	mg
Run Time	60	minutes	Nozzle Diameter (Dn)	0.280	inches

GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)

$$17.64 \times Vm \times Y \times (Pbar + \Delta H / 13.6) \times 1/Tm^{\circ R} = 32.647 \text{ dscf}$$

VOLUME OF WATER IN GAS SAMPLE, STANDARD CONDITIONS (Vwstd)

$$(Wi \times 0.04707) + (Ws \times 0.04715) = 1.931 \text{ scf}$$

PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)

$$\begin{aligned} Vwstd / (Vmstd + Vwstd) &= 0.056 \\ &= 5.6 \% \text{ by volume} \end{aligned}$$

GAS MOLECULAR WEIGHT, DRY BASIS (Md)

$$(0.44 \times CO_2\%) + (0.32 \times O_2\%) + (0.28 \times (100 - O_2\% - CO_2\%)) = 30.76 \text{ lb/lb-mole}$$

GAS MOLECULAR WEIGHT, WET BASIS (Ms)

$$(Md \times (1-Bws)) + (18 \times Bws) = 30.05 \text{ lb/lb-mole}$$

PITOT TUBE COEFFICIENT (Cp)

$$= 0.84$$

ABSOLUTE GAS PRESSURE, (Ps)

$$Pbar + (\text{Static Pressure}/13.6) = 29.78 \text{ in. Hg}$$

GAS VELOCITY, (Vs)

$$85.49 \times Cp \times \text{Square Root delta P} \times ((Ts^{\circ R}/(Ps \times Ms))^{\frac{1}{2}}) = 37.2 \text{ ft/sec.}$$

GAS VOLUME FLOW RATE, (acfmin)

$$\text{Stack Area} \times Vs \times 60 = 61286.4 \text{ acfm}$$

GAS VOLUME FLOW RATE, (scfm)

$$acfmin \times Tstd \times Ps / (Ts^{\circ R} \times Pstd) = 41155.9 \text{ scfm}$$

GAS VOLUME FLOW RATE, (scfh)

$$scfm \times 60 = 2469353.3 \text{ scfh}$$

GAS VOLUME FLOW RATE, (dscfm)

$$(1-Bws) \times acfm \times Tstd \times Ps / (Ts^{\circ R} \times Pstd) = 38857.8 \text{ dscfm}$$

GAS VOLUME FLOW RATE, (dschf)

$$dscfm \times 60 = 2331469.4 \text{ dschf}$$

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC. FIELD DATA SHEET

CLIENT: Rockwell Line AMBIENT TEMPERATURE: 45 BAROMETRIC PRESSURE: 29.86 FILTER NUMBER 5686
 LOCATION: MANITOWAC ASSUMED MOISTURE, %: 8.8% Y FACTOR: .9969 PRE-LEAK RATE: .001 CFM@ 12 in.Hg
 SOURCE: PROBE HEATER SETTING: 260 METER AH@: 1.960 POST-LEAK RATE: .006 CFM@ 11 in.Hg
 DATE: 11/24/94 HEATER BOX SETTING: 260 PROBE NUMBER: Pr 96 PITOT LEAK CHECK PRE: L POST: L
 OPERATOR: JM + MB PROJECT MANAGER: JW NOZZLE #,DIAM,in.: .28 % OXYGEN: 15 % CO₂: 13.5
 RUN #: 1 METERBOX #: 2 STACK DIAMETER inches: .71 LIQUID GAINED: 30 + GEL 11 = Vc: _____
 START: 1004 STOP: 11:04 K FACTOR: 4.34 PORT LENGTH,inches: 7.5 C_p: .84 STATIC PRESSURE + (-).21
 3.89

CLOCK TIME	TRAVERSE POINT NUMBER	MIN/PT SAMPLING	INITIAL VOLUME		VELOCITY HEAD ΔP	ORIFICE SETTING ΔH	PUMP VACUUM	STACK TEMPERATURE T _s	GAS METER TEMPERATURE		IMPIINGER OUTLET TEMPERATURE	FILTER BOX TEMPERATURE	PROBE TEMPERATURE
			SAMPLE VOLUME	T _m					T _{in}	T _{out}			
1-1	2.5	720.12	721.2	.30	1.30	7	268	76	74	60	250	250	
2	5.0	722.7	722.7	.30	1.30	2	270	77	74	53			
3	7.5	723.4	723.4	.31	1.35	3	277	78	75	53			
4	10.0	724.15	724.15	.28	1.22	2	275	79	76	54			
5	12.5	724.8	724.8	.24	1.00	2	278	81	77	54			
6	15.0	727.84	727.84	.26	1.30	3	281	82	77	55			
7	17.5	729.23	729.23	.36	1.56	4	280	83	78	56			
8	20.0	729.61	729.61	.36	1.56	4	280	84	79	56			
9	22.5	731.52	731.52	.40	1.736	4	280	84	80	56			
10	25.0	733.80	733.80	.35	1.52	4	280	85	81	57			
11	27.5	735.49	735.49	.23	0.998	3	279	89	82	58			
12	30.0	736.92	736.92	.27	1.17	3	280	89	82	58			
2-1	32.5	738.29	738.29	.25	1.09	2	360	81	63	58			
2	35.0	739.74	739.74	.32	1.46	2	365	85	84	58			
3	37.5	741.38	741.38	.38	1.67	2	368	85	84	54			
4	40.0	742.84	742.84	.30	1.17	2	369	88	86	53			
5	42.5	744.31	744.31	.39	1.52	2	371	88	86	55			
6	45.0	745.90	745.90	.39	1.52	2	372	89	87	56			
7	47.5	747.45	747.45	.30	1.16	2	372	90	87	56			
8	50.0						376						
9	52.5	750.18	1.29111712	1.29	1.71	2	1370	89	86	57			
10	55.0	751.59	.30	1.16	2	372	91	86	58				
11	57.5	753.01	.27	1.05	2	372	91	86	58				
12	60.0	753.85	.27	1.05	2	355	90	87	58				

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
Location Manitowoc, WI
Source Lime Kiln Baghouse Outlet
Run # 2
Date 11-24-98

Barometric (Pbar)	29.80	in.Hg	Static Pressure (Pg)	-0.22	in.H ₂ O
Meter Y Factor (Y)	0.9969		Volume Measured (Vm)	48.890	cubic ft.
Stack Area (As)	27.494	sq. ft.	Square Root delta P	0.5551	in.H ₂ O
Oxygen	13.8	%	Δ H	2.38	in.H ₂ O
Carbon Dioxide	13.0	%	Gas Temperature (Ts)	374.4	°F
Impinger Condensate (Wi)	42	mL	Meter Temp. (Tm)	83.4	°F
Silica Gel Gain (Ws)	13	g	CPM Inorganic Mass (Mi)	22.9	mg
Front ½ Particulate (Mf)	32.0	mg	CPM Organic Mass (Mo)	3.6	mg
Run Time	60	minutes	Nozzle Diameter (Dn)	0.325	inches

GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)

$$17.64 \times Vm \times Y \times (Pbar + \Delta H / 13.6) \times 1/Tm^{\circ}R = 47.430 \text{ dscf}$$

VOLUME OF WATER IN GAS SAMPLE, STANDARD CONDITIONS (Vwstd)

$$(Wi \times 0.04707) + (Ws \times 0.04715) = 2.590 \text{ scf}$$

PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)

$$\begin{aligned} Vwstd / (Vmstd + Vwstd) &= 0.052 \\ &= 5.2 \% \text{ by volume} \end{aligned}$$

GAS MOLECULAR WEIGHT, DRY BASIS (Md)

$$(0.44 \times CO_2\%) + (0.32 \times O_2\%) + (0.28 \times (100 - O_2\% - CO_2\%)) = 30.63 \text{ lb/lb-mole}$$

GAS MOLECULAR WEIGHT, WET BASIS (Ms)

$$(Md \times (1-Bws)) + (18 \times Bws) = 29.98 \text{ lb/lb-mole}$$

PITOT TUBE COEFFICIENT (Cp)

$$= 0.84$$

ABSOLUTE GAS PRESSURE. (Ps)

$$Pbar + (\text{Static Pressure}/13.6) = 29.78 \text{ in. Hg}$$

GAS VELOCITY. (Vs)

$$85.49 \times Cp \times \text{Square Root delta P} \times ((Ts^{\circ}R/(Ps \times Ms))^{\frac{1}{2}}) = 38.5 \text{ ft/sec.}$$

GAS VOLUME FLOW RATE. (acf m)

$$\text{Stack Area} \times Vs \times 60 = 63570.6 \text{ acfm}$$

GAS VOLUME FLOW RATE. (scfm)

$$acf m \times Tstd \times Ps / (Ts^{\circ}R \times Pstd) = 40042.8 \text{ scfm}$$

GAS VOLUME FLOW RATE. (scfh)

$$scfm \times 60 = 2402567.1 \text{ scfh}$$

GAS VOLUME FLOW RATE. (dscfm)

$$(1-Bws) \times acfm \times Tstd \times Ps / (Ts^{\circ}R \times Pstd) = 37969.5 \text{ dscfm}$$

GAS VOLUME FLOW RATE. (dscfh)

$$dscfm \times 60 = 2278168.0 \text{ dscfh}$$

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
Location Manitowoc, WI
Source Lime Kiln Baghouse Outlet
Run # 2
Date 11-24-98

<u>GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)</u>	=	47.430 dscf
<u>PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)</u>	=	0.052
<u>GAS VOLUME FLOW RATE, (dscfh)</u>	=	2278168.0 dscfh
<u>FRONT 1/2 PARTICULATE MASS, FILTER AND PROBE WASH (Mf)</u>	=	32.0 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), INORGANIC MASS (Mi)</u>	=	22.9 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), ORGANIC MASS (Mo)</u>	=	3.6 mg
<u>FRONT 1/2 PARTICULATE CONCENTRATION, (gr/dscf)</u> $Mf \times 0.001g/mg \times 1/Vmstd \times 15.43 \text{ gr/g}$	=	0.0104 gr/dscf
<u>INORGANIC CPM CONCENTRATION, (gr/dscf)</u> $Mi \times 0.001g/mg \times 1/Vmstd \times 15.43 \text{ gr/g}$	=	0.0074 gr/dscf
<u>ORGANIC CPM CONCENTRATION, (gr/dscf)</u> $Mo \times 0.001g/mg \times 1/Vmstd \times 15.43 \text{ gr/g}$	=	0.0012 gr/dscf
<u>TOTAL MEASURED PARTICULATE MATTER CONCENTRATION, (gr/dscf)</u>	=	0.0190 gr/dscf
<u>FRONT 1/2 PARTICULATE EMISSION RATE, (lb/hr)</u> $2.205E-06 \text{ lb/mg} \times Mf \times \text{dscfh} \times 1/Vmstd$	=	3.3892 lb/hr
<u>INORGANIC CPM EMISSION RATE, (lb/hr)</u> $.205E-06 \text{ lb/mg} \times Mi \times \text{dscfh} \times 1/Vmstd$	=	2.4254 lb/hr
<u>ORGANIC CPM EMISSION RATE, (lb/hr)</u> $2.205E-06 \text{ lb/mg} \times Mo \times \text{dscfh} \times 1/Vmstd$	=	0.3813 lb/hr
<u>TOTAL MEASURED PARTICULATE EMISSION RATE, (lb/hr)</u>	=	6.1958 lb/hr
<u>CALCULATION OF PERCENT ISOKINETIC VARIATION</u>		
$100 \% \times (0.09450 \times Ts^{\circ}R \times Vmstd) / (Ps \times Vs \times An \times \text{minutes} \times (1-Bws))$	=	99.4 %
Gas Temperature, $Ts^{\circ}R =$	834.4	Gas Velocity, $Vs =$ 38.5
Absolute Gas Pressure, $Ps =$	29.78	$1 - Bws =$ 0.948
Area of Nozzle (sq.ft.), $An =$	0.0005761	minutes = 60

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC. FIELD DATA SHEET

CLIENT: Rockwell Line AMBIENT TEMPERATURE: _____ BAROMETRIC PRESSURE: _____ FILTER NUMBER 6685
 LOCATION: MANITOWAC ASSUMED MOISTURE, %: _____ Y FACTOR: .9961 PRE-LEAK RATE: .001 CFM @ 15 in.Hg
 SOURCE: PROBE HEATER SETTING: _____ METER ΔH@: 1.96^o POST-LEAK RATE: .001 CFM @ 17 in.Hg
 DATE: 11/24/98 HEATER BOX SETTING: _____ PROBE NUMBER: _____ PITOT LEAK CHECK: PRE: _____ POST: _____
 OPERATOR: JM + MB PROJECT MANAGER: _____ NOZZLE #, DIAM, in.: .325 % OXYGEN: 13.8 % CO₂: 13.0
 RUN #: 2 METERBOX #: 2 STACK DIAMETER Inches: _____ LIQUID GAINED: 43 + GEL 13 = VLC: _____
 START: 12:00 STOP: K FACTOR: 7.79 PORT LENGTH, inches: _____ C_p: _____ STATIC PRESSURE + (-) .22
 7.51

CLOCK TIME	TRAVERSE POINT NUMBER	MIN/FT 2.5 SAMPLING	INITIAL VOLUME 754.15	VELOCITY HEAD ΔP	ORIFICE SETTING ΔH	PUMP VACUUM	STACK TEMPERATURE T _s	GAS METER TEMPERATURE		IMPINGER OUTLET TEMPERATURE	FILTER BOX TEMPERATURE	PROBE TEMPERATURE
								Tin	Tout			
1-1	2.5	756.38	.35	2.72	4	380	85	90	56	250		
2	5.0	758.47	.35	2.72	4	378	85	90	56	1		
3	7.5	760.56	.31	2.41	4	382	86	91	56			
4	10.0	762.66	.31	2.41	4	381	86	91	56			
5	12.5	764.86	.40	3.11	5	382	87	89	56			
6	15.0	767.11	.32	2.49	4	376	89	88	57			
7	17.5	769.13	.32	2.49	4	375	88	87	57			
8	20.0	771.01	.32	2.49	4	375	89	87	57			
9	22.5	773.34	.31	2.41	4	374	91	87	58			
10	25.0	775.46	.30	2.34	4	373	90	88	58			
11	27.5	777.35	.28	2.18	3	373	91	87	61			
12	30.0	779.07	.17	1.32	2	370	91	86	60	✓		
2-1	32.5	780.91	.26	1.95	3	373	87	84	58			
2-2	35.0	782.82	.32	2.4	3	372	83	83	54			
3	37.5	784.83	.28	2.1	3	372	84	83	54			
4	40.0	786.83	.34	2.57	4	373	85	81	53			
5	42.5	788.93	.34	2.55	4	373	84	80	53			
6	45.0	791.16	.40	3.00	5	373	84	79	52			
7	47.5	792.91	.35	2.63	4	372	83	77	52			
8	50.0	795.50	.35	2.63	4	372	82	76	53			
9	52.5	797.67	.37	2.75	4	373	77	71	51			
10	55.0	799.64	.29	2.18	3	373	72	69	50			
11	57.5	801.40	.20	1.50	2	371	72	69	50			
12	60.0	803.04	.27	1.65	2	370	68	68	49	✓		

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
Location Manitowoc, WI
Source Lime Kiln Baghouse Outlet
Run # 3
Date 11-24-98

Barometric (Pbar)	29.80	in.Hg	Static Pressure (Pg)	-0.22	in.H2O
Meter Y Factor (Y)	0.9969		Volume Measured (Vm)	46.970	cubic ft.
Stack Area (As)	27.494	sq. ft.	Square Root delta P	0.5690	in.H2O
Oxygen	14.0	%	Δ H	2.47	in.H2O
Carbon Dioxide	13.0	%	Gas Temperature (Ts)	371.4	°F
Impinger Condensate (Wi)	46	mL	Meter Temp. (Tm)	53.8	°F
Silica Gel Gain (Ws)	14	g	CPM Inorganic Mass (Mi)	30.1	mg
Front ½ Particulate (Mf)	11.2	mg	CPM Organic Mass (Mo)	10.7	mg
Run Time	60	minutes	Nozzle Diameter (Dn)	0.325	inches

GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)

$$17.64 \times Vm \times Y \times (Pbar + \Delta H / 13.6) \times 1/Tm^{\circ}R = 48.203 \text{ dscf}$$

VOLUME OF WATER IN GAS SAMPLE, STANDARD CONDITIONS (Vwstd)

$$(Wi \times 0.04707) + (Ws \times 0.04715) = 2.825 \text{ scf}$$

PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)

$$\begin{aligned} Vwstd / (Vmstd + Vwstd) &= 0.055 \\ &= 5.5 \% \text{ by volume} \end{aligned}$$

GAS MOLECULAR WEIGHT, DRY BASIS (Md)

$$(0.44 \times CO_2\%) + (0.32 \times O_2\%) + (0.28 \times (100 - O_2\% - CO_2\%)) = 30.64 \text{ lb/lb-mole}$$

GAS MOLECULAR WEIGHT, WET BASIS (Ms)

$$(Md \times (1-Bws)) + (18 \times Bws) = 29.94 \text{ lb/lb-mole}$$

PITOT TUBE COEFFICIENT (Cp)

$$= 0.84$$

ABSOLUTE GAS PRESSURE (Ps)

$$Pbar + (\text{Static Pressure}/13.6) = 29.78 \text{ in. Hg}$$

GAS VELOCITY, (Vs)

$$85.49 \times Cp \times \text{Square Root delta P} \times ((Ts^{\circ}R/(Ps \times Ms))^{\frac{1}{2}}) = 39.5 \text{ ft/sec.}$$

GAS VOLUME FLOW RATE, (acf m)

$$\text{Stack Area} \times Vs \times 60 = 65084.7 \text{ acfm}$$

GAS VOLUME FLOW RATE, (scfm)

$$acf m \times Tstd \times Ps / (Ts^{\circ}R \times Pstd) = 41146.4 \text{ scfm}$$

GAS VOLUME FLOW RATE, (scfh)

$$scfm \times 60 = 2468783.9 \text{ scfh}$$

GAS VOLUME FLOW RATE, (dscfm)

$$(1-Bws) \times acfm \times Tstd \times Ps / (Ts^{\circ}R \times Pstd) = 38868.2 \text{ dscfm}$$

GAS VOLUME FLOW RATE, (dscfh)

$$dscfm \times 60 = 2332093.0 \text{ dscfh}$$

Environmental Monitoring & Technologies, Inc.

EPA Methods 2-5 Moisture, Flow & Particulate Calculation Summary

Company Rockwell Lime
Location Manitowoc, WI
Source Lime Kiln Baghouse Outlet
Run # 3
Date 11-24-98

<u>GAS SAMPLE VOLUME, DRY STANDARD CONDITIONS (Vmstd)</u>	=	48.203 dscf
<u>PROPORTIONAL MOISTURE CONTENT OF GAS BY VOLUME (Bws)</u>	=	0.055
<u>GAS VOLUME FLOW RATE. (dscfh)</u>	=	2332093.0 dscfh
<u>FRONT ½ PARTICULATE MASS, FILTER AND PROBE WASH (Mf)</u>	=	11.2 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), INORGANIC MASS (Mi)</u>	=	30.1 mg
<u>CONDENSIBLE PARTICULATE MATTER (CPM), ORGANIC MASS (Mo)</u>	=	10.7 mg
<u>FRONT ½ PARTICULATE CONCENTRATION. (gr/dscf)</u> $Mf \times 0.001g/mg \times 1/Vmstd \times 15.43 gr/g$	=	0.0036 gr/dscf
<u>INORGANIC CPM CONCENTRATION. (gr/dscf)</u> $Mi \times 0.001g/mg \times 1/Vmstd \times 15.43 gr/g$	=	0.0096 gr/dscf
<u>ORGANIC CPM CONCENTRATION. (gr/dscf)</u> $Mo \times 0.001g/mg \times 1/Vmstd \times 15.43 gr/g$	=	0.0034 gr/dscf
<u>TOTAL MEASURED PARTICULATE MATTER CONCENTRATION. (gr/dscf)</u>	=	0.0166 gr/dscf
<u>FRONT ½ PARTICULATE EMISSION RATE. (lb/hr)</u> $2.205E-06 lb/mg \times Mf \times dscfh \times 1/Vmstd$	=	1.1948 lb/hr
<u>INORGANIC CPM EMISSION RATE. (lb/hr)</u> $.205E-06 lb/mg \times Mi \times dscfh \times 1/Vmstd$	=	3.2110 lb/hr
<u>ORGANIC CPM EMISSION RATE. (lb/hr)</u> $2.205E-06 lb/mg \times Mo \times dscfh \times 1/Vmstd$	=	1.1415 lb/hr
<u>TOTAL MEASURED PARTICULATE EMISSION RATE. (lb/hr)</u>	=	5.5473 lb/hr
<u>CALCULATION OF PERCENT ISOKINETIC VARIATION</u>		
$100 \% \times (0.09450 \times Ts^{\circ}R \times Vmstd) / (Ps \times Vs \times An \times minutes \times (1-Bws))$	=	98.7 %
Gas Temperature, $Ts^{\circ}R$ =	831.4	Gas Velocity, Vs = 39.5
Absolute Gas Pressure, Ps =	29.78	$1 - Bws$ = 0.945
Area of Nozzle (sq.ft.), An =	0.0005761	minutes = 60

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC. FIELD DATA SHEET

CLIENT: Rockwall L. AMBIENT TEMPERATURE: _____ BAROMETRIC PRESSURE: _____ FILTER NUMBER 6688
 LOCATION: Mantova ASSUMED MOISTURE, %: _____ Y FACTOR: .9969 PRE-LEAK RATE: .001 CFM@ 14 in.Hg
 SOURCE: BAG-HOUSE OUTLET PROBE HEATER SETTING: METER ΔH@ 1.960 POST-LEAK RATE: .001 CFM@ 13 in.Hg
 DATE: 11/24/98 HEATER BOX SETTING: PROBE NUMBER: Pr PITOT LEAK CHECK: PRE: _____ POST: _____
 OPERATOR: MB/JM PROJECT MANAGER: NOZZLE #, DIAM., in.: % OXYGEN: 14.0 % CO₂: 13.8
 RUN #: 3 METERBOX #: 2 STACK DIAMETER Inches: LIQUID GAINED: 46 + GEL 14 = Vc: _____
 START: 13:47 STOP: K FACTOR: 7.50 PORT LENGTH, inches: C_p: 22 STATIC PRESSURE + (-) .22

CLOCK TIME	TRAVERSE POINT NUMBER	MIN/FT SAMPLING	INITIAL VOLUME 803.90	VELOCITY HEAD ΔP	ORIFICE SETTING ΔH	PUMP VACUUM	STACK TEMPERATURE T _s	GAS METER TEMPERATURE	IMPIINGER OUTLET TEMPERATURE		FILTER BOX TEMPERATURE	PROBE TEMPERATURE
									Tin	Tout		
1-1	2.5	80572	.32	2.40	G	365	50	51	42	42		
2	5.0	80775	.31	2.32	G	368	50	51	42	42		
3	7.5	809.81	.35	2.63	G	366	51	51	44	44		
4	10.0	811.75	.35	2.63	G	366	51	51	45	45		
5	12.5	813.75	.35	2.63	G	366	53	50	46	46		
6	15.0	815.50	.40	3.0	G	367	53	50	46	46		
7	17.5	818.03	.42	3.15	G	368	54	50	46	46		
8	20.0	820.03	.32	2.40	G	366	54	50	46	46		
9	22.5	821.91	.30	2.25	G	368	55	50	47	47		
10	25.0	823.97	.40	3.0	G	367	56	50	47	47		
11	27.5	826.06	.35	2.63	G	367	57	50	47	47		
12	30.0	827.51	.16	1.20	3	367	57	50	47	47		
2-1	32.5	829.01	.16	1.20	3	368	57	50	47	47		
2	35.0	830.68	.30	2.25	G	360	57	51	45	45		
3	37.5	832.63	.34	2.55	G	366	56	51	46	46		
4	40.0	834.66	.36	2.7	G	367	59	51	46	46		
5	42.5	836.80	.30	2.25	G	368	59	52	46	46		
6	45.0	838.94	.45	3.78	11	368	61	52	47	47		
7	47.5	840.00	.30	2.25	G	367	61	52	47	47		
8	50.0	842.88	.28	2.10	G	360	59	52	47	47		
9	52.5	844.81	.29	2.18	G	375	60	52	47	47		
10	55.0	846.61	.35	2.63	G	372	61	52	46	46		
11	57.5	848.78	.34	2.55	G	381	61	53	47	47		
12	60.0	850.87	.36	2.70	G	385	61	53	47	47		

110 → front 47) (271.38) (52.75)

Environmental Monitoring & Technologies, Inc.

Method 202 Inorganic CPM Calculations

Company Rockwell Lime
Location Manitowoc, WI
Source Lime Kiln Exhaust
Date 11-24-98

INPUT DATA:

	<u>RUN 1</u>	<u>RUN 2</u>	<u>RUN 3</u>
Inorg CPM, mg	51.2	22.1	27.8
impinger vol., mL	240	255	245
IC aliquot, mL	5	5	5
SO ₄ conc, mg/mL	0.0900	0.0749	0.3420

$$M_c = K \times (\text{SO}_4 \text{ conc.}) \times (\text{impinger vol})$$

$$M_i = (\text{Inorg CPM}) \times (\text{impinger vol}/(\text{impinger vol} - \text{IC aliquot})) - M_c$$

M_c = mass of the NH₄⁺ added to sample to form ammonium sulfate

K = -0.0208 (constant)

M_i = (Corrected) Mass of Inorganic CPM, mg

CALCULATIONS:

	<u>RUN 1</u>	<u>RUN 2</u>	<u>RUN 3</u>
M_c (mg)	-0.4	-0.4	-1.7
M_i (mg)	52.7	22.9	30.1

Environmental Monitoring & Technologies, Inc.

Continuous Emission Monitor Field Data Sheet

Company Brockwell Lim^e
 Location Prairie Kueber WI
 Source Lime Kiln Exhaust
 Run # _____
 Date 11-24-98

Cylinder #	Cert. Conc.	PSI	Type	Cylinder #	Cert. Conc.	PSI	Type
CC10433	40.89	1100	SO ₂				
CC65878	45.4	1900	SO ₂				
CC84918	4.50	1200					
CC38489	24.6	900					

CEM I.D.	CEM I.D.
SPAN VALUE	
VOC	
NOx	
CO	
SO ₂	500
O ₂	
CO ₂	

CEM I.D.	Parameter	CEM I.D.	Parameter	CEM I.D.	Parameter	CEM I.D.	Parameter
Time	Conc.	Comments	Time	Conc.	Comments	Time	Conc.
0841	Ø	Direct					
0846	450	"					
0851	246	"					
0857	Ø	Bias					
0859	450	RT					
0904	450	Bias					
0907	246	Bias					
0948	Ø	Zero/Pre					
0951	450	Cal/Pre					
1009	Run1	O ₂ 15.0 CO ₂ 13.5					
1116	Ø	pre/post					
1120	450	pre/post					
1200	Run2	O ₂ 13.8 CO ₂ 13.0					
1312	Ø	pre/post					
1334	450	pre/post					
1342	Run3	O ₂ 14.0 CO ₂ 13.8					
1415	Coals hute	plugged					
1448	Ø	Zero					
1453	450	Cal					

MMDDYY TIME SO2 ppm Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI

112498	8:25	0.1
112498	8:26	0.1
112498	8:27	-0.1
112498	8:28	-0.1
112498	8:29	-0.0
112498	8:30	-0.0
112498	8:31	-0.0
112498	8:32	4.9
112498	8:33	294.4
112498	8:34	347.9
112498	8:35	335.9
112498	8:36	322.9
112498	8:37	189.0
112498	8:38	5.3
112498	8:39	0.8
112498	8:40	0.4
112498	8:41	0.2
112498	8:42	0.1
112498	8:43	135.4
112498	8:44	285.1
112498	8:45	450.3
112498	8:46	452.0
112498	8:47	354.9
112498	8:48	46.9
112498	8:49	232.8
112498	8:50	245.7
112498	8:51	245.8
112498	8:52	225.3
112498	8:53	19.9
112498	8:54	4.0
112498	8:55	2.5
112498	8:56	5.9
112498	8:57	361.3
112498	8:58	209.0
112498	8:59	249.7
112498	9:00	155.1
112498	9:01	141.5
112498	9:02	383.8
112498	9:03	450.5
112498	9:04	450.6
112498	9:05	320.5
112498	9:06	238.3
112498	9:07	242.7
112498	9:08	239.7
112498	9:09	43.6
112498	9:10	5.7
112498	9:11	3.1
112498	9:12	2.2
112498	9:13	6.0
112498	9:14	261.1
112498	9:15	360.5
112498	9:16	366.1
112498	9:17	365.8
112498	9:18	392.3
112498	9:19	350.9
112498	9:20	333.9
112498	9:21	330.9
112498	9:22	345.0

Calibration Data in BOLD
Test Data UNDERLINED

MMDDYY	TIME	SO2 ppm	Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI
112498	9:23	347.6	
112498	9:24	380.1	
112498	9:25	400.2	
112498	9:26	397.6	
112498	9:27	375.3	
112498	9:28	312.9	
112498	9:29	283.1	
112498	9:30	242.1	
112498	9:31	250.8	
112498	9:32	251.9	
112498	9:33	304.8	
112498	9:34	312.9	
112498	9:35	325.4	
112498	9:36	339.4	
112498	9:37	290.4	
112498	9:38	277.3	
112498	9:39	269.8	
112498	9:40	265.0	
112498	9:41	305.3	
112498	9:42	322.9	
112498	9:43	330.4	
112498	9:44	42.7	
112498	9:45	6.4	
112498	9:46	3.5	
112498	9:47	2.4	
112498	9:48	40.4	
112498	9:49	403.6	
112498	9:50	450.7	
112498	9:51	451.3	
112498	9:52	294.9	
112498	9:53	21.6	
112498	9:54	7.0	
112498	9:55	4.0	
112498	9:56	116.9	
112498	9:57	288.9	
112498	9:58	367.5	
112498	9:59	400.0	
112498	10:00	468.1	
112498	10:01	471.4	
112498	10:02	441.2	
112498	10:03	457.4	
112498	10:04	390.7	
112498	10:05	378.1	
112498	10:06	362.4	
112498	10:07	342.0	
112498	10:08	321.2	

MMDDYY	TIME	SO2 ppm	Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI		
112498	10:09	355.0	START RUN 1		
112498	10:10	<u>371.9</u>	AVERAGE CONCENTRATION		
112498	10:11	<u>314.2</u>			
112498	10:12	<u>337.5</u>			
112498	10:13	<u>303.8</u>	SO2	380.6	ppm
112498	10:14	<u>307.6</u>		%	
112498	10:15	<u>297.3</u>			
112498	10:16	<u>328.9</u>	AVERAGE CALIBRATION		
112498	10:17	<u>354.2</u>			
112498	10:18	<u>414.7</u>	ZERO	CAL.	
112498	10:19	<u>441.9</u>	SO2	1.7	450.8 ppm
112498	10:20	<u>461.5</u>			
112498	10:21	<u>477.3</u>			
112498	10:22	<u>438.1</u>			
112498	10:23	<u>422.3</u>	FINAL CALIBRATION CORRECTED TEST RESULTS		
112498	10:24	<u>363.6</u>			
112498	10:25	<u>370.3</u>	SO2	379.7	ppm *
112498	10:26	<u>387.2</u>	SO2	145.06	lb/hr **
112498	10:27	<u>430.5</u>	FLOW	2297551.5	dscfh
112498	10:28	<u>428.7</u>			
112498	10:29	<u>398.7</u>			
112498	10:30	<u>434.8</u>			
112498	10:31	<u>406.9</u>			
112498	10:32	<u>383.1</u>			
112498	10:33	<u>374.5</u>			
112498	10:34	<u>387.9</u>			
112498	10:35	<u>434.0</u>			
112498	10:36	<u>481.1</u>			
112498	10:37	<u>479.6</u>			
112498	10:38	<u>492.5</u>			
112498	10:39	<u>467.9</u>			
112498	10:40	<u>446.5</u>			
112498	10:41	<u>389.2</u>			
112498	10:42	<u>347.7</u>			
112498	10:43	<u>345.1</u>			
112498	10:44	<u>349.8</u>			
112498	10:45	<u>405.6</u>			
112498	10:46	<u>438.1</u>			
112498	10:47	<u>455.0</u>			
112498	10:48	<u>451.5</u>			
112498	10:49	<u>413.7</u>			
112498	10:50	<u>382.6</u>			
112498	10:51	<u>353.7</u>			
112498	10:52	<u>347.6</u>			
112498	10:53	<u>371.0</u>			
112498	10:54	<u>384.5</u>			
112498	10:55	<u>405.4</u>			
112498	10:56	<u>384.5</u>			
112498	10:57	<u>383.0</u>			
112498	10:58	<u>378.6</u>			
112498	10:59	<u>350.7</u>			
112498	11:00	<u>326.1</u>			
112498	11:01	<u>327.6</u>			
112498	11:02	<u>335.8</u>			
112498	11:03	<u>342.2</u>			
112498	11:04	<u>323.4</u>			
112498	11:05	<u>296.9</u>			
112498	11:06	<u>293.9</u>			

MMDDYY TIME SO2 ppm Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI

112498 11:07 256.1
112498 11:08 275.5
112498 11:09 283.1

END RUN 1

112498 11:10 298.5 * Corrected SO2 calculated as follows :
112498 11:11 300.4 2 conc.-Avg. zero)x(Cal. gas conc.)/(Avg. cal.-Avg. zero)
112498 11:12 122.3 SO2 cal gas = 450 ppm

112498 11:13 6.6 ** SO2 lb/hr calculated as follows :
112498 11:14 2.3 (Flow,dscfh) x (Corrected SO2 ppm x 64.06) / (385.26E06)
112498 11:15 1.1

112498 11:16 0.5

112498 11:17 0.2

112498 11:18 -0.0

112498 11:19 -0.1

112498 11:20 18.3

112498 11:21 383.8

112498 11:22 445.2

112498 11:23 449.0

112498 11:24 450.2

112498 11:25 451.0

112498 11:26 401.8

112498 11:27 45.0

112498 11:28 8.4

112498 11:29 3.5

112498 11:30 1.7

112498 11:31 0.8

112498 11:32 0.2

112498 11:33 -0.1

112498 11:34 -0.3

112498 11:35 -0.4

112498 11:36 -0.6

112498 11:37 -0.8

112498 11:38 -0.8

112498 11:39 -0.9

112498 11:40 -0.9

112498 11:41 -0.5

112498 11:42 -0.6

112498 11:43 -0.7

112498 11:44 -0.5

112498 11:45 -0.6

112498 11:46 -0.8

112498 11:47 -0.6

112498 11:48 91.4

112498 11:49 360.9

112498 11:50 382.2

112498 11:51 399.6

112498 11:52 336.3

112498 11:53 297.5

112498 11:54 279.1

112498 11:55 291.9

112498 11:56 289.2

112498 11:57 320.8

112498 11:58 315.1

112498 11:59 312.8

MMDDYY	TIME	SO2 ppm	Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI		
112498	12:00	338.5	START RUN 2		
112498	12:01	311.7			
112498	12:02	312.9	AVERAGE CONCENTRATION		
112498	12:03	307.2			
112498	12:04	293.8	SO2	369.7	ppm
112498	12:05	307.0		%	
112498	12:06	304.0			
112498	12:07	346.6	AVERAGE CALIBRATION		
112498	12:08	335.1			
112498	12:09	353.3	ZERO	CAL.	
112498	12:10	357.9	SO2	0.8	449.8 ppm
112498	12:11	333.6			
112498	12:12	306.9			
112498	12:13	293.1			
112498	12:14	307.9	FINAL CALIBRATION CORRECTED TEST RESULTS		
112498	12:15	346.4			
112498	12:16	360.1	SO2	369.7	ppm *
112498	12:17	356.2	SO2	140.04	lb/hr **
112498	12:18	371.2	FLOW 2278168.0 dscfh		
112498	12:19	331.7			
112498	12:20	316.4			
112498	12:21	303.2			
112498	12:22	292.5			
112498	12:23	318.1			
112498	12:24	353.0			
112498	12:25	356.9			
112498	12:26	365.2			
112498	12:27	369.1			
112498	12:28	346.8			
112498	12:29	332.2			
112498	12:30	309.5			
112498	12:31	332.4			
112498	12:32	331.8			
112498	12:33	374.8			
112498	12:34	400.6			
112498	12:35	383.4			
112498	12:36	416.8			
112498	12:37	385.2			
112498	12:38	388.8			
112498	12:39	358.6			
112498	12:40	367.7			
112498	12:41	373.2			
112498	12:42	440.2			
112498	12:43	473.9			
112498	12:44	466.5			
112498	12:45	451.2			
112498	12:46	431.6			
112498	12:47	408.7			
112498	12:48	390.2			
112498	12:49	397.7			
112498	12:50	391.0			
112498	12:51	462.7			
112498	12:52	466.1			
112498	12:53	474.1			
112498	12:54	486.7			
112498	12:55	433.3			
112498	12:56	426.3			
112498	12:57	383.1			

MMDDYY TIME SO2 ppm Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI

112498 12:58 380.9

112498 12:59 371.6

112498 13:00 431.2

END RUN 2

112498 13:01 449.7 * Corrected SO2 calculated as follows :
112498 13:02 441.0 $2 \text{ conc.-Avg. zero} \times (\text{Cal. gas conc.}) / (\text{Avg. cal.-Avg. zero})$
112498 13:03 457.2 SO2 cal gas = 450 ppm
112498 13:04 395.2
112498 13:05 363.3 ** SO2 lb/hr calculated as follows :
112498 13:06 329.9 $(\text{Flow,dscfh}) \times (\text{Corrected SO2 ppm} \times 64.06) / (385.26E06)$
112498 13:07 329.5
112498 13:08 343.9
112498 13:09 254.8
112498 13:10 11.8
112498 13:11 2.0
112498 13:12 0.4
112498 13:13 18.7
112498 13:14 122.3
112498 13:15 132.5
112498 13:16 139.5
112498 13:17 126.6
112498 13:18 128.5
112498 13:19 119.5
112498 13:20 117.5
112498 13:21 6.6
112498 13:22 6.5
112498 13:23 -0.3
112498 13:24 -1.1
112498 13:25 -1.3
112498 13:26 -0.7
112498 13:27 -0.7
112498 13:28 -0.9
112498 13:29 1.6
112498 13:30 26.9
112498 13:31 304.0
112498 13:32 447.0
112498 13:33 451.1
112498 13:34 446.3
112498 13:35 109.2
112498 13:36 11.8
112498 13:37 5.1
112498 13:38 2.9
112498 13:39 1.7
112498 13:40 136.9
112498 13:41 368.8

MMDDYY	TIME	SO2 ppm	Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI		
112498	13:42	386.1	START RUN 3		
112498	13:43	385.5	AVERAGE CONCENTRATION		
112498	13:44	401.5			
112498	13:45	464.1			
112498	13:46	474.3	SO2	395.0	ppm
112498	13:47	464.1		%	
112498	13:48	476.2	AVERAGE CALIBRATION		
112498	13:49	433.3			
112498	13:50	442.3			
112498	13:51	422.6	ZERO	CAL.	
112498	13:52	422.1	SO2	2.6	450.2 ppm
112498	13:53	410.1			
112498	13:54	492.1	FINAL CALIBRATION CORRECTED TEST RESULTS		
112498	13:55	476.4			
112498	13:56	481.3			
112498	13:57	482.2			
112498	13:58	440.1	SO2	394.5	ppm *
112498	13:59	423.1	SO2	152.98	b/hr **
112498	14:00	380.4			
112498	14:01	376.3			
112498	14:02	393.0			
112498	14:03	433.9			
112498	14:04	483.8			
112498	14:05	471.8			
112498	14:06	469.2			
112498	14:07	457.6			
112498	14:08	436.0			
112498	14:09	378.8			
112498	14:10	382.3			
112498	14:11	412.3			
112498	14:12	479.9			
112498	14:13	250.3			
112498	14:14	41.7			
112498	14:15	17.7			
112498	14:16	140.8			
112498	14:17	212.4			
112498	14:18	238.2			
112498	14:19	261.0			
112498	14:20	278.8			
112498	14:21	361.8			
112498	14:22	388.5			
112498	14:23	366.7			
112498	14:24	448.5			
112498	14:25	427.2			
112498	14:26	392.0			
112498	14:27	365.7			
112498	14:28	374.3			
112498	14:29	406.2			
112498	14:30	403.5			
112498	14:31	434.1			
112498	14:32	438.2			
112498	14:33	461.8			
112498	14:34	467.3			
112498	14:35	431.5			
112498	14:36	416.6			
112498	14:37	430.4			
112498	14:38	443.2			
112498	14:39	416.0			

MMDDYY	TIME	SO2 ppm	Rockwell Lime, Lime Kiln Exhaust, Manitowoc, WI
112498	<u>14:40</u>	<u>420.5</u>	
112498	<u>14:41</u>	<u>414.9</u>	
112498	<u>14:42</u>	<u>404.3</u>	END RUN 3
112498	14:43	446.6	* Corrected SO2 calculated as follows :
112498	14:44	443.4	2 conc.-Avg. zero)x(Cal. gas conc.)/(Avg. cal.-Avg. zero)
112498	14:45	242.1	SO2 cal gas = 450 ppm
112498	14:46	9.8	
112498	14:47	4.6	** SO2 lb/hr calculated as follows :
112498	14:48	3.5	(Flow,dscfh) x (Corrected SO2 ppm x 64.06) / (385.26E06)
112498	14:49	3.1	
112498	14:50	2.8	
112498	14:51	452.9	
112498	14:52	449.9	
112498	14:53	220.0	
112498	14:54	74.5	
112498	14:55	-999.0	
112498	14:56	-999.0	
112498	14:57	-999.0	
112498	14:58	-999.0	
112498	14:59	-999.0	

Appendix B

Laboratory Results Chain of Custody Records

ONEWEI SETI WASHINGTON PA

NO. 46-182-175-001

MI 120 80 80 80 80 80 80

150

EMT STICK TEST #2 K-60

Rockwell Lure Co.

Opacity Chart Recorder

100 100 100 100 100 100 100 100

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30 115 50 115 90 115 120

150

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1:09 EWS

4/26/10 10:09 AM STANT 12453

20 612 60 50 PDT 120

150